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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

MICHAEL BURROWS, an Individual.

CASE NO.: 07CV1567 BEN (WMG)

Plaintiff:

v.

13 ORCHID ISLAND TRS, LLC, successor to
14 OPTEUM FINANCIAL SERVICES, LLC;
15 GOLDEN VALLEY LENDING GROUP, INC.,
a California corporation; CHRISTINE R.
16 SMITH, an Individual; JESSICA GRAF, an
Individual; and DOES 1-25, inclusive.

**STIPULATION AND REQUEST FOR
ORDER TO EXTEND AND ENLARGE
DEADLINE DATE FOR EXPERT
DEPOSITIONS**

Defendants.

This Stipulation and Request for Order to Extend and Enlarge Deadline Date for Expert Depositions is made by and between Plaintiff Michael Burrows and Defendants Golden Valley Lending Group, Inc., Christine R. Smith, and Jessica Graf (collectively "Defendants") through their respective counsel, in light of the following facts:

RECITALS

A. On September 21, 2009, a Pretrial Conference was held during which the Court set jury trial of the above-entitled case for April 27, 2009. [Doc. 126.]

STIPULATION AND REQUEST FOR ORDER TO EXTEND AND ENLARGE DEADLINE DATE FOR EXPERT DEPOSITIONS

1 B. During the Pretrial Conference, the Court also extended the discovery deadline date for
2 thirty (30) days from the date of the hearing in order to complete expert witness depositions. [Doc.
3 126.]

4 C. Due to limited availability of the parties' expert witnesses and other scheduling
5 conflicts, counsel for Plaintiff and Defendants have encountered difficulty coordinating available dates
6 to complete expert depositions. Additionally, Plaintiff's counsel will be out-of-state between the dates
7 of October 13, 2009 and October 25, 2009.

8 D. Based on the foregoing, the parties respectfully request an order extending the
9 discovery deadline to November 30, 2009 by which to complete expert depositions.

10 E. The parties believe that an extension of November 30, 2009 will allow the parties to
11 adequately complete expert depositions, and that such extension will not compromise the current April
12 27, 2009 trial date set for this matter.

STIPULATION

14 IT IS HEREBY STIPULATED by and between the parties hereto, through their respective
15 counsel, that the discovery deadline by which to complete expert depositions be extended to November
16 30, 2009

Dated: 10/5/09

JONATHAN KURNIADI
THE JK LAW FIRM, A.P.C.
Attorney for Plaintiff MICHAEL BURROWS

21 Dated: 10.5.09

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LLP
Attorneys for Defendants GOLDEN VALLEY
LENDING GROUP, INC., a California corporation,
CHRISTINE R. SMITH, and JESSICA GRAF